

EXHIBIT 2

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ALICE LEE, et al.,
Plaintiffs,
v.
GLOBAL TEL *LINK
CORPORATION,
Defendant.

CASE NO. 2:15-cv-02495-ODW-PLA
(consolidated with 2:15-cv-03464-
ODW-PLA)

**CELLCO PARTNERSHIP d/b/a
VERIZON WIRELESS'
OBJECTIONS TO PLAINTIFF'S
SUBPOENA TO PRODUCE
DOCUMENTS, INFORMATION
OR OBJECTS OR TO PERMIT
INSPECTION OF PREMISES IN A
CIVIL ACTION**

The Hon. Otis D. Wright, II

1 Cellco Partnership d/b/a Verizon Wireless (“Verizon Wireless”) hereby objects
2 to the Subpoena to Produce Documents, Information or Objects or to Permit
3 Inspection of Premises in a Civil Action served on it by counsel for Plaintiff Alice
4 Lee on April 25, 2017 (the “Subpoena”) as follows:

- 5
6 1. Verizon Wireless objects to the Subpoena to the extent it seeks to impose
7 duties or obligations that are inconsistent with or beyond those imposed by
8 the Federal Rules of Civil Procedure.
- 9
10 2. Verizon Wireless hereby objects to the Subpoena to the extent it seeks
11 information relating to subscribers in California, Delaware and
12 Pennsylvania, as Verizon Wireless is precluded by statute from providing
13 responsive information for subscribers in those states. *See* Cal. P.U.C. §
14 2981; Del. Code 11, § 2423; 18 Pa. C.S.A. § 5742.
- 15
16 3. Verizon Wireless objects to the Subpoena on the grounds that it is overly
17 burdensome, harassing and oppressive. In particular, the Subpoena is not
18 reasonably tailored to avoid imposing undue burden and expense on
19 Verizon Wireless and therefore, fails to comply with Rule 45(c)(1) of the
20 Federal Rules of Civil Procedure.
- 21
22 4. Verizon Wireless objects to the Subpoena to the extent that it requires
23 Verizon Wireless to bear any expenses in connection with responding to the
24 Subpoenas, including but not limited to legal costs and fees incurred in
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1 identifying and retrieving documents and making them available for
2 inspection, or costs and fees incurred in providing notice to customers
3 whose information the Subpoena seeks.
4

5 5. Verizon Wireless objects to the Subpoena to the extent it seeks disclosure
6 of proprietary, commercially sensitive, and/or confidential business
7 information.
8

9 6. Verizon Wireless objects to the Subpoena to the extent it calls for Verizon
10 Wireless to create documents not kept in the ordinary course of business.
11 Verizon Wireless further objects to the Subpoena to the extent it seeks the
12 production of documents in an order and format other than that in which
13 they are kept in the ordinary course of business.
14
15

16
17 DATED: May 9, 2017

SCHEPER KIM & HARRIS LLP
JEAN M. NELSON

18
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20 By: 
21 Jean M. Nelson
22 Attorneys for Verizon Wireless
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PROOF OF SERVICE

ALICE LEE, et al. v. GLOBAL TEL *LINK CORPORATION
Case No. 2:15-cv-02495-ODW-PLA (consolidated with 2:15-cv-03464-ODW-PLA)

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 601 West Fifth Street, 12th Floor, Los Angeles, CA 90071-2025.

On May 9, 2017, I served true copies of the following document(s) described as **CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS' OBJECTIONS TO PLAINTIFF'S SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the practice of Scheper Kim & Harris LLP for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address mbaggett@scheperkim.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

BY MESSENGER SERVICE: I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed on the Service List and providing them to a professional messenger service for service.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on May 9, 2017, at Los Angeles, California.


Michele Baggett

DECLARATION OF MESSENGER

I personally delivered the envelope or package received from the declarant above to the persons at the addresses listed in the service list. (1) For a party represented by an attorney, delivery was made to the attorney or at the attorney's office by leaving the documents in an envelope or package, which was clearly labeled to identify the attorney being served, with a receptionist or an individual in charge of the office. (2) For a party, delivery was made to the party or by leaving the documents at the party's residence with some person not less than 18 years of age between the hours of eight in the morning and six in the evening.

At the time of service, I was over 18 years of age. I am not a party to the above-referenced legal proceeding.

I served the envelope or package, as stated above, on
(date): _____

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: _____

(NAME OF DECLARANT)

(SIGNATURE OF DECLARANT)

SERVICE LIST

ALICE LEE, et al. v. GLOBAL TEL *LINK CORPORATION
Case No. 2:15-cv-02495-ODW-PLA (consolidated with 2:15-cv-03464-ODW-PLA)

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